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UNITED STATES DISTRICT COURT DISTRICT OF NEVADA, SOUTHERN DIVISION

LAURA PETERS,

Plaintiff,

VS.

SWIFT TRANSPORTATION CO. OF ARIZONA, LLC; DOE DRIVER; DOES I through X; XYZ CORPORATIONS XI through XX; and ABC LIMITED LIABILITY COMPANIES XXI through XXX, inclusive,

Defendant(s).

CASE NO.: 2:19-cv-00874-GMN-GWF

Stipulation and Order Extending Deadline to Respond to Defendant's Motion to Compel Deposition Testimony of Plaintiff (ECF 43) (First Request)

Plaintiff, LAURA PETERS ("Plaintiff"), and Defendant, SWIFT TRANSPORTATION CO. OF ARIZONA, LLC ("Defendant"), by and through their respective, undersigned counsel of record, hereby stipulate and agree to extend the deadline for Plaintiff to respond to Defendant's Motion to Compel Deposition Testimony of Plaintiff (ECF No. 43) from Tuesday, April 6, 2021, to Friday, April 9, 2021. The Motion was filed on March 23, 2021. This is the first stipulation for an extension of time to respond to the Motion.

The parties respectfully submit that this extension is appropriate, and necessary, to accommodate party counsel's ongoing, good-faith efforts to resolve the issues raised in Defendant's aforesaid motion by way of stipulation. The short extension of time sought herein affords the parties



further time and opportunity to work toward their mutual goals of advancing discovery and 1 2 avoiding judicial intervention. 3 The parties aver this stipulation is not being submitted for reasons of delay or for any other 4 untoward purpose. 5 DATED this 6th day of April 2021. DATED this 6th day of April 2021. 6 LADAH LAW FIRM WEINBERG WHEELER HUDGINS GUNN 7 & DIAL 8 /s/ Ryan Gormley. /s/ Ramzy Paul Ladah 9 RYAN GORMLEY, ESQ. RAMZY PAUL LADAH, ESQ. Nevada Bar No. 8735 10 Nevada Bar No. 11405 1117 South Rancho Drive 517 S. Third Street 11 Las Vegas, NV 89102 Las Vegas, NV 89101 Attorneys for Defendants Attorney for Plaintiff 12 13 14 IT IS SO ORDERED. 15 16 17 18 Dated: April 6, 2021 19 20 21 22 23 24 25 **26** 27 28